

E. Evans Wohlforth, Jr.  
Sabrina M. Galli  
**ROBINSON & COLE LLP**  
666 Third Avenue, 20th Floor  
New York, New York 10017  
Telephone: (212) 451-2900  
Facsimile: (212) 451-2999  
ewohlforth@rc.com  
sgalli@rc.com

Philippe Z. Selendy (admitted *pro hac vice*)  
Andrew R. Dunlap (admitted *pro hac vice*)  
Meredith Nelson (admitted *pro hac vice*)  
Elizabeth H. Snow (admitted *pro hac vice*)  
**SELENDY GAY PLLC**  
1290 Avenue of the Americas  
New York, NY 10104  
Tel: 212-390-9000  
pselendy@selendygay.com  
adunlap@selendygay.com  
mnelson@selendygay.com  
esnow@selendygay.com

*Attorneys for Defendant Save On SP, LLC*

**UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY**

|  |  |
|--|--|
| JOHNSON & JOHNSON<br>HEALTH CARE SYSTEMS INC.,<br><br>Plaintiff,<br><br>v.<br><br>SAVE ON SP, LLC,<br><br>Defendant. | Civil Action No. 22-2632 (JS)(CLW)<br><br><i>Document Electronically Filed</i><br><br><b>Return Date: July 15, 2023</b><br><br><b>NOTICE OF MOTION TO SEAL</b> |
|--|--|

**PLEASE TAKE NOTICE** on July 15, 2024 at 9:00 a.m. or a date and time to be set by the Court, the undersigned attorneys for Defendant Save On SP, LLC (“SaveOnSP”) and Plaintiff Johnson & Johnson Health Care Systems, Inc. (“JJHCS”) shall jointly move for the entry of an order, pursuant to Local Civil Rules 5.3(c) and 7.1, permanently sealing portions of March 12, 2024 Motion to Compel Regarding Supplemental Interrogatories and Exhibits 1-8,

12-26, together with SaveOnSP's March 20, 2024 Opposition and Exhibits 1-3, 5-22, as well as JJHCS's Reply and Exhibits 30-37, 39-42 [ECF No. 297]. This Motion is timely pursuant to the motion for an extension of time granted by the Honorable Judge Wolfson on June 5, 2024. Pursuant to Local Civil Rule 7.1(d)(4), no legal brief is required because all relevant proposed findings of fact and conclusions of law required by Local Civil Rule 5.3(c)(3) have been set forth in the Declaration of E. Evans Wohlforth, Jr., Esq. submitted herewith.

**PLEASE TAKE FURTHER NOTICE** that, in support of the within motion, Defendant shall rely upon the Declaration of E. Evans Wohlforth, Jr., Esq., and upon the pleadings and all prior proceedings in the above-captioned action.

**PLEASE TAKE FURTHER NOTICE** that a copy of the proposed Findings of Fact and Conclusions of Law and Order Granting the Motion to Seal is submitted with this Notice.

**PLEASE TAKE FURTHER NOTICE** that a certificate attesting to the date and manner of service of these moving papers is submitted herewith.

Dated: June 18, 2024

By: s/ E. Evans Wohlforth, Jr.  
E. Evans Wohlforth, Jr.  
Sabrina M. Galli  
**ROBINSON & COLE LLP**  
666 Third Avenue, 20th Floor  
New York, New York 10017  
Telephone: (212) 451-2900  
Facsimile: (212) 451-2999  
ewohlforth@rc.com  
sgalli@rc.com

Philippe Z. Selendy (admitted *pro hac vice*)  
Andrew R. Dunlap (admitted *pro hac vice*)  
Meredith Nelson (admitted *pro hac vice*)  
Elizabeth H. Snow (admitted *pro hac vice*)  
**SELENDY GAY PLLC**  
1290 Avenue of the Americas  
New York, NY 10104

Tel: 212-390-9000  
pselendy@selendygay.com  
adunlap@selendygay.com  
mnelson@selendygay.com  
esnow@selendygay.com

*Attorneys for Defendant Save On SP, LLC*

SILLS CUMMIS & GROSS P.C.  
One Riverfront Plaza  
Newark, New Jersey 07102  
(973) 643-7000

By: s/ Jeffrey J. Greenbaum  
JEFFREY J. GREENBAUM  
KATHERINE M. LIEB

PATTERSON BELKNAP  
WEBB & TYLER LLP  
Adeel A. Mangi  
Harry Sandick (admitted pro hac vice)  
George LoBiondo  
1133 Avenue of the Americas  
New York, New York 10036  
(212) 336-2000

*Attorneys for Plaintiff Johnson & Johnson  
Health Care Systems, Inc.*